

## REMARKS

Reconsideration of the application in light of the amendments and the following remarks is respectfully requested.

### Status of the Claims

Claims 36-51 are pending. Claim 44 has been amended to change its dependency to claim 36. No new matter has been added. Claims 52 and 53 are canceled without prejudice or disclaimer of the subject matter contained therein. Claims 1-35 were canceled in previous filings.

Applicants appreciatively acknowledge the Examiner's allowance of claims 45-51.

### Response to Restriction Requirement

The Examiner has restricted the claimed invention to one of the following groups:

Group I. Claims 36-51; drawn to monitoring user events and customization.

Group II. Claim 52; drawn to generating reports and statistics.

Group III. Claim 53; drawn to replicating the operation of the host application.

In response to the Restriction Requirement Applicants elect Group I (claims 36-51).

Applicants make this election without traverse.

### Overview of the Claimed Invention

In one aspect of the claimed invention, a host application model is used to capture object information to enable a monitor program to execute the host application as ICAP solutions in a manner similar to macros. Pathways and links built into the host application model facilitate

the evaluation, and discovery, of possible pathways. The host application model of the claimed invention is a real-time structure that reflects the actual GUI object structure generated by the application. GUI object instances are captured and paths are calculated between them. The claimed monitoring method can, independent of a user input set, discover pathways to a given destination using path finding algorithms applied to the host application model. The application model includes a GuiFramework that is applied to analyze data for both navigation and intelligent inference. Besides representations of instances of GUI objects in the application, the GuiFramework also contains links and connective information so that traversal actions, symbolic representations, and other operations can be processed or generated by the monitor method.

### **Rejection Under 35 U.S.C. § 103**

Claims 36-40 and 42-44 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,697,088 to Hollander in view of U.S. Patent No. RE37,431 to Lanier et al. (“Lanier”). Applicants respectfully traverse the rejection.

The Examiner contends that Hollander discloses most of the features of independent claim 36. The Examiner acknowledges that Hollander does not disclose the steps of “intercepting, during execution of the host application, one or more operating system messages to obtain a plurality of information relating to a plurality of data events; organizing the intercepted data events in the session structure; and analyzing the data events to make automated inference of a user’s interaction with the host application,” as recited in claim 36. The Examiner cites Lanier as disclosing those claimed features missing from Hollander and states that it would have been obvious for a person of ordinary skill in the art to combine Hollander and Lanier to achieve the invention of claims 36-40 and 42-44.

Applicants submit that Hollander does not disclose a host application model or a GuiFramework. Hollander (FIG. 1) discloses a development tool 50 which generates graphic and character based presentation definitions that are stored in databases 28. The development tool 50 has no reference to any hierarchical or linked structures that represent the organizational structure (i.e., models) of the host application. Hollander discloses that commands (e.g., SHOWWIN 58) are initiated by the host application 30. Hollander further states that

“In response to the show presentation command 40, a message 42 is sent to the presentation manager 22. . . . The message 42 includes an identifier that identifies a specific screen (e.g., a 3270 screen) or a specific graphical display (e.g., a window) associated with a particular presentation. The message 42 also includes the data associated with the screen or display.”

(Hollander, column 4, lines 28-36.)

Applicant submits that Hollander discloses the use of commands that are translated or mapped to corresponding screens (i.e., a screen translator system). Hollander does not disclose anything resembling a GuiFramework. The lack of a GuiFramework prevents navigational pathways through the host application from being calculated or verified independently of the run time of states of the host application. Hollander’s use of the term “definitions” refers to merely the screens i.e. visual representations without including organizational structural information.

Applicant submits that Lanier discloses a static, limited solution when compared to the claimed invention. Lanier discloses a system that is dependent on user input to yield a help result from a help information database 335 that contains a plurality of rules 334 and text 336. (Lanier, column 3, lines 11-12.) Thus, Lanier is merely disclosing a text help system. If a user executes a pattern recognized from the information database 335, then help is extracted (via rules 334) from the system. This makes the system solely dependent on user input. Lanier requires

pre-definition of the rules — “Rules 334 are predefined by application developer.” (Lanier, column 10, lines 16-17.)

Because Hollander and Lanier neither disclose, nor suggest, a host application model or a GuiFramework, the combination of Hollander and Lanier results in system that does not have all the features of the claimed invention. For instance, both Hollander and Lanier depend on user input to drive their respective systems. Hollander depends on interactions to yield commands. Lanier requires user actions to serve as input to a rules inference engine.

Additionally, Hollander depends on host application-initiated commands to drive user interface display translations. Hollander discloses that “[h]ost applications 30 running on the host processor 20 generate data that is to be displayed by the clients 24 and 26 as part of a graphic-based or character-based presentation.” (Hollander, column 3, lines 37-40.) For example, Hollander discloses “[a] host application 30 initiates a presentation by executing a command referred to in FIG. 1 as show presentation 40.” (Hollander, column 4, lines 25-27.) Hollander discloses utilizing display changes to trigger host application commands, which are then processed. As is known in the art, display changes can be triggered by either user interactions or autonomous processes and events (e.g., a clock display). Lanier depends on user input to drive the delivery of static help text. Lanier requires user actions to serve as input to a rules inference engine. The combination of Hollander and Lanier does not result in a system that can determine new permutations of host application GUI interactions, navigation, processes, or displays which can be controlled by either a user or generated by the host application.

The Lanier system cannot discover new permutations of assistance. The Lanier system solutions are limited to solely the user action information discovered at the time of development. The Hollander system solutions are limited to solely the results of user actions

resulting in presentation information, and application processing resulting in presentation information, discovered at the time of development. In contrast the claimed invention can self discover permutations of user input not found at development time by “analyzing the data events to make automated inference of a user’s interaction with the host application,” as recited in the claims.

Claims 37-40 and 42-44 depend from claim 36 and recite features in addition to the features of their base claim. Applicants submit, for the reasons demonstrated above, that Hollander and Lanier neither discloses, nor suggests, singly or in combination the invention of claims 36-40 and 42-44. Therefore, Applicants submit that the Examiner has failed to meet the burden of establishing a *prima facie* case of obviousness over these claims. Reconsideration and withdrawal is respectfully requested.

Claims 40 and 41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hollander and Lanier in view of U.S. Patent No. 6,725,377 to Kouznetsov. Applicants respectfully traverse the rejection.

The Examiner cites Kouznetsov as disclosing “The monitoring schedule allows the user to set the time period for each day of a week that CyberCop Network will monitor.” (Detailed Action, page 8.) Applicants submit that Kouznetsov neither discloses nor suggests those features missing from Hollander and Lanier, as demonstrated above. Therefore, Applicants submit that the combination of Hollander, Lanier, and Kouznetsov neither discloses nor suggests the invention of claims 40 and 41. Reconsideration and withdrawal of the rejection is requested.

CONCLUSION

Each and every point raised in the Office Action dated May 20, 2005 has been addressed on the basis of the above amendments and remarks. In view of the foregoing it is believed that claims 36-51 are in condition for allowance and it is respectfully requested that the application be reconsidered and that all pending claims be allowed and the case passed to issue.

If there are any other issues remaining which the Examiner believes could be resolved through a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at the telephone number indicated below.

Respectfully submitted,



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Dated: October 20, 2005

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